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16 Attorneys for Mr. Raul Gil

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAUL GIL,

Defendant.

Case No.: 2:22-cr-00147-APG-EJY

STIPULATION TO CONTINUE
SENTENCING
(Fourth Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, Eric C. Schmale, Assistant United States Attorney, Thomas W. Flynn, Trial Attorney, Tax Division, as counsel for the United States of America, and George P. Kelesis and Sunethra Muralidhara, as counsel for the defendant, Raul Gil, that the sentencing in the above-captioned matter, currently scheduled for June 15, 2023 at 9:30 AM, be vacated and continued to

1 August 31, 2023 at 10:00 AM.¹

2 This Stipulation is entered into for the following reasons:

- 3 1. Defendant is out of custody and does not object to the continuance.
- 4
- 5 2. Lead counsel for the Defendant, Raul Gil, recently received notice that a grand jury
- 6 subpoena has been issued in an unrelated matter that will necessitate counsel's
- 7 presence in another jurisdiction on the date set for sentencing in this matter.
- 8 3. In addition, counsel for defendant has been experiencing cardiac episodes with
- 9 increasing frequency and has been advised to avoid stress as much as possible until
- 10 surgery to address the issue is performed.
- 11
- 12 4. Counsel for defendant is scheduled for heart surgery in mid-July which will require 7
- 13 days complete bedrest and a period of 4-6 weeks rehabilitation thereafter.
- 14 5. The parties need additional time to determine their positions regarding sentencing,
- 15 gather and prepare support for their positions, file sentencing memoranda, and prepare
- 16 for argument.
- 17
- 18 6. Counsel for the government agrees to the continuance.
- 19 7. The additional time requested by this Stipulation is made in good faith and not for
- 20 purposes of delay.
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26 ¹ Date and time provided by judicial staff and has been confirmed as available by all
27 counsel.

1 This is the fourth request for continuation of the sentencing hearing.

2 DATED this 1st day of June 2023.

3 JASON M. FRIERSON
4 UNITED STATES ATTORNEY

5 COOK & KELESIS, LTD.

6 By: /s/ George P. Kelesis
7 GEORGE P. KELESIS, ESQ.
8 Nevada Bar No. 000069
9 *Counsel for Defendant Gil*

By: /s/ Thomas W. Flynn
THOMAS W. FLYNN
Trial Attorney

10 /s/ Sunethra Muralidhara
11 Sunethra Muralidhara
12 Nevada Bar No. 013549
13 *Counsel for Defendant Gil*

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

Case No.: 2:22-cr-00147-APG-EJY

4 Plaintiff,

5 v.

6 RAUL GIL,

7 **ORDER CONTINUING**
SENTENCING HEARING

8 Defendant.

9
10 Based on the Stipulation of counsel and for good cause appearing, the Court hereby
11 continues the sentencing of Defendant Raul Gil in this matter. The ends of justice served by
12 granting said continuance outweigh the best interest of the public and the Defendant in a speedy
13 sentencing because:

14 1. Defendant is out of custody and does not object to the continuance.

15 2. Lead counsel for the Defendant, Raul Gil, recently received notice that a grand
16 jury subpoena has been issued in an unrelated matter that will necessitate counsel's presence in
17 another jurisdiction on the date set for sentencing in this matter.

18 3. In addition, counsel for defendant has been experiencing cardiac episodes with
19 increasing frequency and has been advised to avoid stress as much as possible until surgery to
20 address the issue is performed.

21 4. Counsel for defendant is scheduled for heart surgery in mid-July which will
22 require 7 days complete bedrest and a period of 4-6 weeks rehabilitation thereafter.

1 5. The parties need additional time to determine their positions regarding sentencing,
2 gather and prepare support for their positions, file sentencing memoranda, and prepare for
3 argument.

4
5 6. Counsel for the government agrees to the continuance.

6 IT IS THEREFORE ORDERED that the sentencing in the above-captioned matter,
7 currently scheduled for June 15, 2023 at 9:30 AM is vacated and continued to the 31st day of
8 August, 2023 at the hour of 10:00 AM.

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12 HONORABLE ANDREW P. GORDON
13 UNITED STATES DISTRICT JUDGE

14 Dated: June 2, 2023
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